

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-CR-20560-LEIBOWITZ**

**UNITED STATES OF AMERICA**

**vs.**

**RODERICK VANDERBILT,**

**Defendant.**

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**STIPULATION CONCERNING DISCOVERY AND  
PERSONAL IDENTIFYING INFORMATION**

THE PARTIES HEREBY STIPULATE TO THE FOLLOWING CONCERNING ALL  
DISCOVERY AND PERSONAL IDENTIFYING INFORMATION:

**IT IS HEREBY STIPULATED** that the United States may provide personal identifying information in its possession that the United States believes necessary to comply with its discovery obligations;

**IT IS FURTHER STIPULATED** that all discovery materials provided by the United States shall be considered and designated as “Confidential”;

**IT IS FURTHER STIPULATED** that counsel of record for the Defendant shall hold the discovery materials in strict confidence, disclosing the information to counsel’s client, staff, investigators, and witnesses only to the extent counsel believes is necessary to assist in the defense of this matter;

**IT IS FURTHER STIPULATED** that counsel of record for the Defendant shall advise any person to whom the discovery materials are disclosed that the information must be held in strict confidence and the recipient may not further disclose or disseminate the information;

**IT IS FURTHER STIPULATED** that the United States is authorized to disclose to counsel of record for the Defendant personal identifying information that the United States has

acquired in its investigation. The United States and the attorneys for the United States associated with this case hereby are protected in the disclosure of these materials.

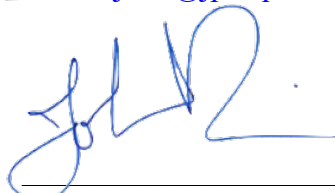
LORINDA I. LARYEA  
Acting Chief, Fraud Section  
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By:



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